

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:  
THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,  
  
Debtors.<sup>1</sup>

PROMESA  
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**MOTION (A) TO ESTABLISH EXTENDED DEADLINE FOR RESPONSES TO OMNIBUS  
OBJECTIONS SCHEDULED FOR HEARING AT DECEMBER 11, 2019 AND JANUARY  
29, 2020 OMNIBUS HEARINGS, (B) TO CONTINUE THE HEARING AS TO OMNIBUS  
OBJECTIONS SCHEDULED FOR HEARING AT DECEMBER 11, 2019 AND JANUARY  
29, 2020 OMNIBUS HEARING UNTIL THE APRIL 22, 2020 OMNIBUS HEARING, (C)  
APPROVING FORM OF NOTICE, AND (D) GRANTING RELATED RELIEF**

To the Honorable United States District Court Judge Laura Taylor Swain:

The Commonwealth of Puerto Rico (the “Commonwealth”), the Puerto Rico Highways and Transportation Authority (“HTA”), and the Employees Retirement System for the Government of the Commonwealth of Puerto Rico (“ERS,” and together with the Commonwealth and HTA, the “Debtors”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as representative for the Commonwealth, HTA, and ERS pursuant to Section 315(b) of the Puerto Rico Oversight, Management and Economic Stability Act (“PROMESA”),<sup>2</sup>

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> PROMESA has been codified at 48 U.S.C. §§ 2101-2241.

hereby respectfully submit this motion (the “Motion”), pursuant to Section 105(a) of Title 11 of the United States Code (the “Bankruptcy Code”), made applicable to these cases pursuant to PROMESA section 301(a), and Rules 2002(m) and 3007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), made applicable to these cases pursuant to PROMESA section 310, for entry of an order, substantially in the form annexed hereto as **Exhibit A** (the “Proposed Order”), (a) establishing a deadline for filing responses to the December Objections and the January Objections (as defined below), (b) continuing the hearing on the December Objections and the January Objections until April 22, 2020, (c) approving form of notice, and (d) granting related relief, and in support of this Motion, the Debtors respectfully state as follows:

### **JURISDICTION**

1. The United States District Court for the District of Puerto Rico has subject matter jurisdiction to consider this matter and the relief requested herein pursuant to PROMESA section 306(a).
2. Venue is proper in this district pursuant to PROMESA section 307(a).

### **BACKGROUND**

3. Pursuant to notice, the following omnibus objections (collectively, the “December Objections”) to deficient claims were filed and scheduled for hearing on December 11, 2019 (the “December Hearing”):

- *Seventy-Eighth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [ECF No. 8964];
- *Seventy-Ninth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [ECF No. 8965];
- *Eightieth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims*

*Asserting Interests Based on Salary Demands, Employment, or Services Provided* [ECF No. 8967];

- *Eighty-First Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [ECF No. 8968];
- *Eighty-Second Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [ECF No. 8969];
- *Eighty-Third Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [ECF No. 8970];
- *Eighty-Fourth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes* [ECF No. 8971];
- *Eighty-Fifth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes* [ECF No. 8973];
- *Eighty-Sixth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes* [ECF No. 8975];
- *Eighty-Seventh Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes* [ECF No. 8976];
- *Eighty-Eighth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes* [ECF No. 8977];
- *Eighty-Ninth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes* [ECF No. 8978];
- *Ninetieth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement*

*System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes* [ECF No. 8979];

- *Ninety-First Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes* [ECF No. 8980];
- *Ninety-Second Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes* [ECF No. 8981];
- *Ninety-Third Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes* [ECF No. 8982];
- *Ninety-Fourth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Miscellaneous Deficient Claims* [ECF No. 8983];
- *Ninety-Fifth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Miscellaneous Deficient Claims* [ECF No. 8984].

4. Claimants subject to the December Objections were required to file and serve responses no later than 4:00 p.m. (Atlantic Time) on November 26, 2019 (the “December Response Deadline”).

5. At the December Hearing, the Court granted the December Objections as to those individuals who had neither filed responses nor submitted supplemental mailings as of the December Hearing. December Objections to claims filed by individuals who responded to the December Objections or who had submitted a supplemental mailing were adjourned to the January Hearing, as defined below, and then, by notices, further adjourned to the omnibus hearing scheduled for April 22, 2020 (the “April Hearing”).

6. In addition, pursuant to notice, the following omnibus objections (collectively, the “January Objections”) to deficient claims were filed and scheduled for hearing on January 29, 2020 (the “January Hearing”):

- *Ninety-Sixth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [ECF No. 9546];
- *Ninety-Seventh Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [ECF No. 9547];
- *Ninety-Eighth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [ECF No. 9548];
- *Ninety-Ninth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [ECF No. 9549];
- *One Hundredth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [ECF No. 9550];
- *One Hundred First Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [ECF No. 9551];
- *One Hundred Second Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [ECF No. 9552];
- *One Hundred Third Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [ECF No. 9553];
- *One Hundred Fourth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [ECF No. 9554];



- *One Hundred Fifth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [ECF No. 9555];
- *One Hundred Sixth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [ECF No. 9556];
- *One Hundred Seventh Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [ECF No. 9557];
- *One Hundred Eighth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [ECF No. 9558];
- *One Hundred Ninth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes* [ECF No. 9559];
- *One Hundred Tenth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes* [ECF No. 9560];
- *One Hundred Eleventh Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes* [ECF No. 9561];
- *One Hundred Twelfth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes* [ECF No. 9562];
- *One Hundred Thirteenth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes* [ECF No. 9563];

- *One Hundred Fourteenth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes* [ECF No. 9564];
- *One Hundred Fifteenth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes* [ECF No. 9565];
- *One Hundred Sixteenth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes* [ECF No. 9566];
- *One Hundred Seventeenth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes* [ECF No. 9567];
- *One Hundred Eighteenth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes* [ECF No. 9568];
- *One Hundred Nineteenth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Miscellaneous Deficient Claims* [ECF No. 9569];
- *One Hundred Twentieth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Miscellaneous Deficient Claims* [ECF No. 9570];
- *One Hundred Twenty-First Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Miscellaneous Deficient Claims* [ECF No. 9572];
- *One Hundred Twenty-Second Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Miscellaneous Deficient Claims* [ECF No. 9574];
- *One Hundred Twenty-Third Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority,*

*and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Miscellaneous Deficient Claims* [ECF No. 9576].

7. Claimants subject to the January Objections were required to file and serve responses no later than 4:00 p.m. (Atlantic Time) on January 14, 2020 (the “January Response Deadline”).

8. At the January Hearing, the Court granted the January Objections as to those claimants who had neither filed responses nor submitted supplemental mailings as of the January Hearing. January Objections to claims filed by individuals who responded to the January Objections or who had submitted a supplemental mailing were adjourned, by notices, to the April Hearing.

9. Notwithstanding the December Response Deadline and the January Response Deadline, and despite the Court’s oral order granting the December Objections and the January Objections as to individuals who had not responded as of the December Hearing and the January Hearing, numerous claimants subject to the December Objections and the January Objections have continued to serve and file responses thereto. Late-filed responses to the December Objections and the January Objections have been adjourned, by notices or orders of the Court, to the April 22, 2020 omnibus hearing.

### **RELIEF REQUESTED**

10. Continued serial filing of responses to the December Objections and the January Objections is inconsistent with the orders of this Court, and presents a significant burden to the Court and to the Clerk’s Office. Moreover, it creates a conundrum as to whether relief has already been granted with respect to either the December Objections or the January Objections.

11. Despite the foregoing, the Debtors understand the difficulties faced by the citizens of Puerto Rico. Indeed, in light of the fall and winter holiday season, which coincided with the response periods, as well as the January 2020 earthquake swarm, the Debtors submit that, notwithstanding the relief already granted, there should be a one-time extension of the deadline for claimants subject to the December Objections and the January Objections to file and serve responses thereto, in the manner described in the notices accompanying such objections, until **March 27, 2020**.



12. To notify claimants subject to the December Objections and the January Objections of this extended deadline and of the continuance of the hearing as to the Debtors' objection to their claim(s), the Debtors intend to file and serve a notice, the form of which is attached hereto as **Exhibit B**, notifying such claimants that the deadline to respond to the December Objections and the January Objections has been extended until March 27, 2020, and that the hearing on the objection to their claim(s) has been adjourned to the April 22, 2020 omnibus hearing. The notice shall also inform claimants that, to the extent they have already submitted a response to the December Objections or the January Objections, no further response need be submitted. Further, the notice shall inform claimants that any responses submitted after March 27, 2020 will not be considered by the Court, and that no further extensions shall be granted absent good cause shown.

13. The Debtors respectfully request the Court enter orders disallowing any claims subject to the December Objections and the January Objections as to which no response has been received as of March 27, 2020.

14. For the avoidance of doubt, the March 27, 2020 deadline for submitting responses shall apply **only** to claimants subject to the December Objections and the January Objections.

### **NOTICE**

15. The Debtors shall provide notice of this motion and accompanying notice upon all claimants subject to the December Objections and the January Objections and the Master Service List (as defined by the *Eleventh Amended Case Management Procedures* [Case No. 17-3283, ECF No. 11885-1]), and this motion is available on the Debtors' case website at <https://cases.primeclerk.com/puertorico>. The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be given.

### **NO PRIOR REQUEST**

16. No prior request for the relief sought in this motion has been made to this or any other court.

WHEREFORE the Debtors respectfully request entry of an order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein and granting such other relief as is just and proper.

Dated: March 10, 2020

San Juan, Puerto Rico

Respectfully submitted,

/s/ Hermann D. Bauer

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Commonwealth of Puerto Rico*

**Exhibit A**

**Proposed Order**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:  
THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,  
as representative of  
THE COMMONWEALTH OF PUERTO RICO, *et al.*,  
Debtors.<sup>1</sup>

PROMESA  
Title III  
No. 17 BK 3283-LTS  
(Jointly Administered)

**ORDER (A) ESTABLISHING EXTENDED DEADLINE FOR RESPONSES TO OMNIBUS  
OBJECTIONS SCHEDULED FOR HEARING AT DECEMBER 11, 2019 AND JANUARY  
29, 2020 OMNIBUS HEARINGS, (B) CONTINUING THE HEARING AS TO OMNIBUS  
OBJECTIONS SCHEDULED FOR HEARING AT DECEMBER 11, 2019 AND JANUARY  
29, 2020 OMNIBUS HEARINGS UNTIL THE APRIL 22, 2020 OMNIBUS HEARING, (C)  
APPROVING FORM OF NOTICE, AND (D) GRANTING RELATED RELIEF**

Upon the *Motion (A) To Establish Extended Deadline for Responses to Omnibus  
Objections Scheduled for Hearing At December 11, 2019 and January 29, 2020 Omnibus Hearings,  
(B) To Continue the Hearing as to Omnibus Objections Scheduled for Hearing at December 11, 2019  
and January 29, 2020 Omnibus Hearing Until the April 22, 2020 Omnibus Hearing, (C) Approving  
Form of Notice, and (D) Granting Related Relief*, dated March 10, 2020 (the “Motion”),<sup>2</sup> of the  
Debtors for entry of an order (this “Order”) establishing an extended deadline for responses to  
omnibus objections scheduled for hearing at the December 11, 2019 and January 29, 2020 omnibus  
hearings, continuing the hearing as to omnibus objections scheduled for hearing at the December 11,

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> All capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2019 and January 29, 2020 omnibus hearing until the April 22, 2020 omnibus hearing, approving an additional form of notice, and granting related relief, as more fully described in the Motion; and this Court having jurisdiction over this matter pursuant to PROMESA section 306(a); and it appearing that venue is proper pursuant to PROMESA section 307(a); and the Court having found that the relief requested in the Debtors' Motion is in the best interests of the Debtors, their creditors, and other parties in interest; and the Court having found that, based upon the relief requested by the Debtors' Motion, no other or further notice is required; and the Court having determined that the legal and factual bases set forth in the Debtors' Motion establish just cause for the relief granted herein; and any objections to the relief requested herein having been resolved as set forth herein, or withdrawn or overruled on the merits; and after due deliberation and sufficient cause appearing therefor,

**IT IS HEREBY ORDERED THAT:**

1. The Motion is granted to the extent set forth herein.
2. The deadline for responses to the December Objections and the January Objections is hereby extended until 4:00 p.m. (Atlantic Time) on March 27, 2020 (the "Extended Response Deadline"). Any responses to the December Objections and/or the January Objections shall be heard at the April 22, 2020 omnibus hearing.
3. Responses filed after March 27, 2020 shall not be considered by the Court. No further extensions to the March 27, 2020 deadline shall be granted, absent good cause shown.
4. Nothing in this Order or in the Motion is, or shall be deemed to constitute, any admission as to the validity, nature, amount, or priority of any claim asserted against the Debtors in these PROMESA cases, or a waiver of any right of the Debtors or any other party in interest in these cases to dispute the validity, nature, amount, or priority of, or otherwise object, either in the same or subsequent objections, on any grounds to any such claims.
5. The Debtors' proposed form of notice, attached to the Motion as Exhibit B, is approved.
6. This Court retains exclusive jurisdiction with respect to all matters arising from or



related to the implementation, interpretation, and enforcement of this Order.

Dated: \_\_\_\_\_, 2020

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Honorable Judge Laura Taylor Swain  
United States District Judge

**Exhibit B**

**Notice of Extension of Deadlines and of Adjournment**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:  
THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,  
as representative of  
THE COMMONWEALTH OF PUERTO RICO, *et al.*,  
Debtors.<sup>1</sup>

PROMESA  
Title III  
No. 17 BK 3283-LTS  
(Jointly Administered)

**NOTICE OF (A) EXTENSION OF DEADLINE FOR RESPONSES  
TO OMNIBUS OBJECTIONS TO CLAIMS SCHEDULED FOR HEARING ON  
DECEMBER 11, 2019 OR JANUARY 29, 2020 AND  
(B) CONTINUANCE OF HEARING AS TO LATE-FILED RESPONSES**

To the Honorable United States District Judge Laura Taylor Swain:

**IMPORTANT INFORMATION REGARDING YOUR CLAIM**

**If your claim(s) is subject to the December Objections or the January Objections (as defined below), which are listed in Appendix I to this Notice, you have been granted a one-time extension of the deadline for filing and serving a response.**

**Any responses must be filed and served so that they are received by the Court on or before 4:00 p.m. (Atlantic Time) on March 27, 2020.**

**If your claim(s) is subject to the December Objections or the January Objections, and you do not submit your response on or before 4:00 p.m. (Atlantic Time) on March 27, 2020, your response will not be considered by the Court.**

**No further extensions will be granted, absent good cause shown.**

**The Court will hold a hearing on the December Objections and the January Objections on April 22, 2020.**

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

1. Pursuant to notice, various objections to deficient proofs of claim filed against the Commonwealth of Puerto Rico (the “Commonwealth”), the Puerto Rico Highways and Transportation Authority (“HTA”), and the Employees Retirement System for the Government of the Commonwealth of Puerto Rico (“ERS,” and together with HTA and the Commonwealth, the “Debtors”) were filed and scheduled for hearing on December 11, 2019 (collectively, the “December Objections”). A complete list of the December Objections is set forth in Section A of Appendix 1 hereto. Claimants subject to the December Objections were required to file and serve responses no later than 4:00 p.m. (Atlantic Time) on November 26, 2019 (the “December Response Deadline”).

2. In addition, pursuant to notice, various omnibus objections (collectively, the “January Objections”) to deficient claims were filed and scheduled for hearing on January 29, 2020 (the “January Hearing”). A complete list of the January Objections is set forth in Section B of Attachment 1 hereto. Claimants subject to the January Objections were required to file and serve responses no later than 4:00p.m. (Atlantic Time) on January 14, 2020 (the “January Response Deadline”).

3. Notwithstanding the December Response Deadline and the January Response Deadline, numerous claimants subject to the December Objections and the January Objections have continued to serve and file responses thereto (collectively, the “Late-Filed Responses”).

4. In light of the fall and winter holiday season, as well as the January 2020 earthquake swarm, the Debtors have consented to a one-time extension, until March 27, 2020, of the deadline for claimants subject to the December Objections and the January Objections to file and serve responses thereto, in the manner described in the notices accompanying such objections.

5. If your claim is subject to the December Objections or the January Objections, you may file and serve a response such that it is received by the Court on or before March 27, 2020. The hearing on the December Objections and the January Objections shall be adjourned to the April 22, 2020 omnibus hearing.

6. If your claim(s) is subject to the December Objections or the January Objections, and you have already filed a response, you DO NOT need to resubmit your response.

7. If your claim is subject to the December Objections or the January Objections, and you do not file and serve a response on or before March 27, 2020, your response will not be considered by the Court.

8. For the avoidance of doubt, the March 27, 2020 deadline shall apply only to the December Objections and the January Objections identified in Appendix I hereto.

**Additional Resources and Who to Contact with Questions**

All documents filed in the Title III Cases, including copies of claims filed using CM/ECF, are available free online at <https://cases.primeclerk.com/puertorico>. This website is maintained by Prime Clerk and includes a searchable database to assist with locating documents.

If you require additional information regarding the Omnibus Objection, the status of your response, your claim, or this notice, please contact the Prime Clerk hotline at **(844) 822-9231** (toll free for U.S. and Puerto Rico) or **(646) 486-7944** (for international callers), available 10:00 a.m. to 7:00 p.m. (Atlantic Time) (Spanish available). Inquiries may also be sent via email to [puertoricoinfo@primeclerk.com](mailto:puertoricoinfo@primeclerk.com).



**Appendix I**

**A. December Objections:**

- *Seventy-Eighth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [ECF No. 8964];
- *Seventy-Ninth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [ECF No. 8965];
- *Eightieth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [ECF No. 8967];
- *Eighty-First Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [ECF No. 8968];
- *Eighty-Second Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [ECF No. 8969];
- *Eighty-Third Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [ECF No. 8970];
- *Eighty-Fourth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes* [ECF No. 8971];
- *Eighty-Fifth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes* [ECF No. 8973];
- *Eighty-Sixth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims*

*Asserting Interests Based on Unspecified Puerto Rico Statutes* [ECF No. 8975];

- *Eighty-Seventh Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes* [ECF No. 8976];
- *Eighty-Eighth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes* [ECF No. 8977];
- *Eighty-Ninth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes* [ECF No. 8978];
- *Ninetieth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes* [ECF No. 8979];
- *Ninety-First Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes* [ECF No. 8980];
- *Ninety-Second Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes* [ECF No. 8981];
- *Ninety-Third Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes* [ECF No. 8982];
- *Ninety-Fourth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Miscellaneous Deficient Claims* [ECF No. 8983];
- *Ninety-Fifth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Miscellaneous Deficient Claims* [ECF No. 8984].

**B. January Objections:**

- *Ninety-Sixth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [ECF No. 9546];
- *Ninety-Seventh Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [ECF No. 9547];
- *Ninety-Eighth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [ECF No. 9548];
- *Ninety-Ninth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [ECF No. 9549];
- *One Hundredth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [ECF No. 9550];
- *One Hundred First Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [ECF No. 9551];
- *One Hundred Second Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [ECF No. 9552];
- *One Hundred Third Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [ECF No. 9553];
- *One Hundred Fourth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to*

*Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [ECF No. 9554];

- *One Hundred Fifth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [ECF No. 9555];
- *One Hundred Sixth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [ECF No. 9556];
- *One Hundred Seventh Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [ECF No. 9557];
- *One Hundred Eighth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [ECF No. 9558];
- *One Hundred Ninth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes* [ECF No. 9559];
- *One Hundred Tenth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes* [ECF No. 9560];
- *One Hundred Eleventh Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes* [ECF No. 9561];
- *One Hundred Twelfth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes* [ECF No. 9562];
- *One Hundred Thirteenth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees*



*Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes [ECF No. 9563];*

- *One Hundred Fourteenth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes [ECF No. 9564];*
- *One Hundred Fifteenth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes [ECF No. 9565];*
- *One Hundred Sixteenth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes [ECF No. 9566];*
- *One Hundred Seventeenth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes [ECF No. 9567];*
- *One Hundred Eighteenth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes [ECF No. 9568];*
- *One Hundred Nineteenth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Miscellaneous Deficient Claims [ECF No. 9569];*
- *One Hundred Twentieth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Miscellaneous Deficient Claims [ECF No. 9570];*
- *One Hundred Twenty-First Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Miscellaneous Deficient Claims [ECF No. 9572];*
- *One Hundred Twenty-Second Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Miscellaneous Deficient Claims [ECF No. 9574];*



- *One Hundred Twenty-Third Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Miscellaneous Deficient Claims* [ECF No. 9576].